

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JAMES FLETCHER JR.,

Plaintiff,

v.

JEROME BOGUCKI, ANTHONY
NORADIN, RAYMOND SCHALK,
ANTHONY WOJCIK, UNKNOWN CITY OF
CHICAGO POLICE OFFICERS, and the
CITY OF CHICAGO

Defendants.

Case No. 20-cv-04768

Judge Andrea Wood

Magistrate Judge Maria Valdez

JURY TRIAL DEMANDED

JOINT MOTION FOR EXTENSION OF TIME

Plaintiff, James Fletcher, and Defendants City of Chicago, Jerome Bogucki, Anthony Noradin, Raymond Schalk, and Anthony Wojcik, by their respective attorneys, present this joint motion for extension of time.

1. On November 9, 2022, during a status hearing in front of the Court, parties requested that the fact discovery deadline be extended to March 31, 2023, in order to finalize oral discovery. In response, the Court directed the parties to identify the witnesses who still needed to be deposed, and to continue conferring about the length of time needed to complete fact discovery. Dkt. 89. The Court then provisionally extended fact discovery to March 31, 2023, and further directed the parties to file a joint status report laying out which specific witnesses Plaintiff and the Defendants were planning to depose. *Id.*

2. The parties conferred, and realized that it would be unlikely they would be able to complete fact discovery by the end of March 2023, in light of the number of witnesses to be deposed, potential motion practice the parties believed they may have to undergo regarding

written discovery, as well as two trials in March and April of 2023 pending for counsel for both the City and the Individual Defendants. Therefore, when the parties filed a status report laying out which deposition testimony Plaintiff and Defendants were still seeking, they also proposed a fact discovery deadline of June 30, 2023 instead. Dkt. 90.

3. Though parties have been diligent in scheduling and taking depositions over the past several months, counsel for both the Plaintiff and Defendants believe that a fact discovery extension until June 30, 2023, is still necessary. On top of the previously identified trial schedules on behalf of Defense, counsel for Plaintiff is likewise preparing for trial in April. As such, the ability of all parties to take oral discovery has and will be limited in the forthcoming months.

4. Since November of 2022, however, parties have taken the depositions of the following witnesses: Defendant Anthony Noradin, Detective Fleming, Officer Fitzgerald, Officer Gilger, J. Cunyon Gordon, Natasha Reeves, and Deborah Sanders. Parties have also scheduled depositions for the remaining Defendant Depositions and are working to schedule the remaining third-party witnesses. As such, parties believe that a June 30, 2023, discovery deadline will suffice to finalize fact discovery.

5. Accordingly, the parties formally request that this Court extend the fact discovery deadline to June 30, 2023.

Respectfully Submitted,

By: /s/ Mariah Garcia

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CERTIFICATE OF SERVICE

I hereby certify that on **March 16, 2023** I caused the foregoing **Joint Motion for Extension of Time** with the Clerk of the Court using the ECF system, which sent electronic notification of the filing on the same day to all counsel of record via the Court's CM/ECF system.

/s/ Mariah Garcia
Attorney for Plaintiff